

**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES

NO. 2:20-cr-00045-GAM

JUDGE MCHUGH

v.

ABDUR RAHIM ISLAM  
SHAHIED DAWAN  
KENYATTA JOHNSON  
DAWN CHAVOUS

Defendants

**DEFENDANT KENYATTA JOHNSON'S**  
**SUPPLEMENTAL REQUEST FOR INFORMATION**  
**ON VOIR DIRE**

TO THE HONORABLE GERALD A. McHUGH, JUDGE OF THE SAID COURT:

Defendant Kenyatta Johnson, by and through his attorneys, Fox Rothschild LLP, respectfully requests the Court to obtain the following information from the jury panel on Voir Dire, as to the jurors, their relatives and close friends in addition to the questions provided by the Court to counsel:

1. Have you had any training or work experience in any of the following:
  - a. Politics or government
  - b. Consulting
  - c. Education or schooling
  - d. Property development
  - e. Real estate investment
  - f. Non-profit organizations
  - g. Media or news
  - h. Judicial system
  - i. Law enforcement
2. Have you or someone close to you ever declared bankruptcy or otherwise participated in bankruptcy proceedings?
3. Do you believe the federal government should be more aggressive in prosecuting political corruption?

4. Do you believe Charter schools tend to waste taxpayer dollars?
5. Do you believe the charter school industry suffers from corruption?
6. Do you agree with any of the following statements:
  - a. Politicians from Philadelphia tend to be dishonest or unethical.
  - b. Most politicians tend to be dishonest or unethical.
  - c. I tend not to trust politicians.
  - d. Property developers tend to be dishonest or unethical.
  - e. Consultants tend to be dishonest or unethical.
  - f. I consider myself to be sophisticated and knowledgeable about politics and government.
  - g. It is better for married women to be homemakers than to work outside of the home.
  - h. Women have an unfair advantage in the job market.
  - i. Work performed by women tends to be undervalued relative to the same work performed by men.
  - j. African-Americans and other persons of color have an unfair advantage in the job market.
  - k. Muslims tend to be dishonest or unethical.
  - l. persons of African American heritage are more prone to commit crimes.
7. How often do you read, listen to, or watch news coverage?
8. Have you read or heard anything about the defendants in this case, Abdur Rahim Islam, Shahied Dawan, Kenyatta Johnson, and/or Dawn Chavous?
9. Have you read or heard anything about any of the following:
  - a. Universal Community Homes
  - b. Universal Education Companies
  - c. Universal Real Estate Development Corporation
  - d. The Royal Theater in Philadelphia
  - e. The properties located at 1309-1313 Bainbridge Street in Philadelphia

Dated: March 10, 2022

Respectfully submitted,

/s/ Patrick J. Egan

Patrick J. Egan

Nathan Huddell

Stephanie Ohnona

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*Attorneys for Defendant Kenyatta Johnson*

**CERTIFICATE OF SERVICE**

I, Patrick Egan, hereby certify that on this day, I caused the foregoing to be filed electronically with the Case Management/Electronic Case Filing System (“CM/ECF”) for the Federal Judiciary. Notice of this filing will be sent to all parties by operation of the Notice of Electronic Filing system, and the parties to this action may access this filing through CM/ECF.

Dated: March 10, 2022

/s/ Patrick J. Egan

Patrick J. Egan